### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

TQ DELTA, LLC,	§
Plaintiff,	§
	§ JURY TRIAL DEMANDED
v.	§
	§
COMMSCOPE HOLDING COMPANY,	§
INC., COMMSCOPE INC., ARRIS	§
INTERNATIONAL LIMITED, ARRIS	§
GLOBAL LTD., ARRIS US HOLDINGS,	§ Civil Action 2:21-cv-310-JRG
INC., ARRIS SOLUTIONS, INC., ARRIS	§ (Lead Case)
TECHNOLOGY, INC., and ARRIS	§
ENTERPRISES, LLC,	§
	§

# PLAINTIFF TQ DELTA, LLC'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE BILL OF COSTS

Plaintiff TQ Delta, LLC respectfully requests a two-day extension of its deadline to file its Bill of Costs in view of the following.

The original deadline to submit TQ Delta's Bill of Costs was May 17, 2023, following the Court's entry of Final Judgment on May 3, 2023. *See* Dkt. 513. This deadline was extended to May 24, 2023, because the Court granted TQ Delta's Unopposed Motion for an Extension of Time allowing the parties an additional week to meet and confer. *See* Dkt. 515.

Since TQ Delta has served the CommScope Defendants with a proposed bill of costs and supporting documentation, the parties have further met and conferred at length by phone, specifically on May 22 and May 24, 2023, to discuss disputes and potential compromises and have also exchanged correspondence regarding the same. The parties have reached agreement on multiple disputed issues and are in the process of conferring on several remaining disputes and

require some additional time to reach an appropriate agreement concerning TQ Delta's Bill of Costs, before finalizing the proposed submissions to the Court.

The CommScope Defendants do not oppose the relief requested in this Motion and agree that an extension is appropriate for the parties to further confer regarding any remaining disputes.

Accordingly, TQ Delta respectfully requests a two-day extension of time, until and including May 26, 2023, to file the Bill of Costs.

Dated: May 24, 2023 Respectfully submitted,

By: /s/ Edward K. Chin

#### Peter J. McAndrews

(*Pro hac vice*) pmcandrews@mcandrews-ip.com

### Rajendra A. Chiplunkar

(Pro hac vice) rchiplunkar@mcandrews-ip.com

#### David Z. Petty

(Pro hac vice) dpetty@mcandrews-ip.com

#### Ashley Ratycz

(Pro hac vice) aratycz@mcandrews-ip.com

# MCANDREWS, HELD & MALLOY, LTD

500 West Madison St., 34th Floor

Chicago, IL 60661 Telephone: (312) 775-8000

Facsimile: (312) 775-8100

#### **Anthony K. Bruster**

<u>akbruster@brusterpllc.com</u> Texas Bar No. 24036280

#### Edward K. Chin

ed@brusterpllc.com Texas Bar No. 50511688

# Andrew J. Wright andrew@brusterpllc.com

Texas Bar No.24063927

#### Shawn A. Latchford

shawn@brusterpllc.com Texas Bar No. 24066603

#### **BRUSTER PLLC**

680 N. Carroll Ave., Suite 110 Southlake, TX 76092 (817) 601-9564 – Telephone

#### William E. Davis, III

Texas State Bar No. 24047416 bdavis@davisfirm.com

#### Christian J. Hurt

Texas State Bar No. 24059987 churt@davisfirm.com

# Rudolph "Rudy" Fink IV

Texas State Bar No. 24082997 rfink@davisfirm.com

#### Ty Wilson

Texas State Bar No. 24106583 twilson@davisfirm.com

#### THE DAVIS FIRM PC

213 N. Fredonia Street, Suite 230 Longview, Texas 75601 Telephone: (903) 230-9090 Facsimile: (903) 230-9661

## ATTORNEYS FOR PLAINTIFF TQ DELTA, LLC

#### **CERTIFICATE OF CONFERENCE**

Pursuant to Local Rules-7(h) and (i), I hereby certify that I conferred with counsel of record on May 24, 2023, regarding the subject of this Motion. There was no opposition to the above motion.

<u>/s/ Peter J. McAndrews</u> Peter J. McAndrews

#### **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document is being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served this May 24, 2023, on all counsel of record, each of whom is deemed to have consented to electronic service. L.R. CV-5(a)(3)(A).

<u>/s/ Edward Chin</u> Edward Chin